



August 9, 2018

Mr. Adam Bognar
Environmental Quality Analyst
Michigan Department of Environmental Quality/Air Quality Division
Southeast Michigan District Office
27700 Donald Court
Warren, Michigan 48092

Dear Mr. Bognar:

Subject: Violation Notice
Heat Treating Services Corporation – Plant 3
915 Oakland Avenue, Pontiac, Michigan
SRN: N6726
CEC Project 165-218

On behalf of our client, Heat Treating Services Corporation of America, Inc (HTSI), Civil & Environmental Consultants, Inc. (CEC) is submitting this response to the above referenced Violation Notice.

BACKGROUND

On June 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Heat Treating Services Corporation – Plant 3 located at 915 Oakland Avenue in Pontiac, Michigan. The purpose of this inspection was to determine Heat Treating Services Corporation – Plant 3’s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 169-01. During the inspection, DEQ personnel noted that HTSI – Plant 3 had installed and commenced operation of unpermitted equipment at the facility. The equipment in question is a belt model natural gas fired metal heat-treating furnace with a maximum heat input of 10.9 MM BTU/hr, designated as line “R5”.

CORRECTIVE ACTION

The violation began in April 2015 and has been ongoing since that time. The violation occurred due to the fact the current HTSI personnel did not realize that heat-treating furnaces in excess of 10 MM BTU/hr required permitting. HTSI has begun the process of modifying permit 169-01 to include furnace line "R5". As part of that permit modification project, HTSI plans include a modification to the conditions for the operation of permitted quench furnace HR-1. The current emissions control equipment associated with that furnace has become antiquated and expensive to maintain. HTSI intends to modify the permit to match the conditions of the quenching operations at their Plant 1 and Plant 2 facilities. In the process of reviewing their operations, HTSI has determined that furnace line "R7", a natural gas fired roller hearth furnace located in Plant 3 North should also be included in the permit. Based on the results of the inspection and this VN, HTSI understands the requirements of R 336.1201. HTSI will ensure that any future furnace installations will be evaluated prior to installation, such that a permit modification can be completed in accordance with DEQ regulations.

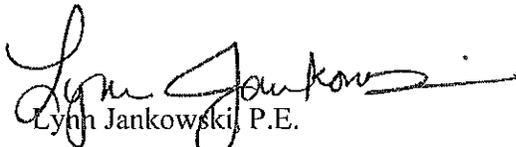
SCHEDULE

Based on the permit modifications to be completed, particularly in regard to furnace HR-1, HTSI is planning to submit the permit application on or before October 12, 2018.

HTSI appreciates your assistance and understanding in this matter. Please let us know if you have any questions.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.


Lynn Jankowski, P.E.
Project Manager


Ryan D. Dunning
Principal

cc: Ken Rogghe - HTSI